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April 21, 2021

Via CM/ECF

Honorable Edward S. Kiel, U.S.M.J.
United States District Court
District of New Jersey
Frank R. Lautenberg U.S. Post
Office & Courthouse Building
2 Federal Square
Newark, NJ 07102

Re: Scalia v. 300 Broadway Healthcare, L.L.C., et al 2:20-00622-CCC-ESK

Dear Judge Kiel:

This firm represents Defendant Steve Kleiman and Defendant New Vista in the above referenced matter. Please accept this request for an additional two-week extension for the parties to file the papers necessary to dismiss this action under F.R.C.P. 41. All parties consent to this request for extension.

The parties are in the process of finalizing the Consent Agreement and circulating the Agreement for execution.

With the Courts permission it is respectfully requested that the parties be permitted to file their Consent Agreement by no later than May 5, 2021.

We thank Your Honor for your time and consideration.

SO ORDERED

s/Claire C. Cecchi
Claire C. Cecchi, U.S.D.J.

Date: 4/21/2021

Respectfully submitted,

JASINSKI, P.C.

s/ Robert P. Manetta

ROBERT P. MANETTA